# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.<sup>1</sup>

PROMESA Title III

No. 17 BK 3283-LTS (Jointly Administered)

## AMBAC ASSURANCE CORPORATION'S INFORMATIVE MOTION REGARDING ITS REQUEST TO BE HEARD AT THE OCTOBER 25, 2017 HEARINGS

Ambac Assurance Corporation ("Ambac") hereby submits this informative motion in compliance with (1) the *Order Setting Briefing Deadlines and Scheduling Hearing on FEMA Urgent Motion* [17-3283, Dkt. No. 1450], and (2) the *Order Scheduling Hearing on COFINA Agent's Motion Pursuant to 48 U.S.C.* § 2161 and 11 U.S.C. § 105(a) for Order: (I) Confirming That 48 U.S.C. § 2125 Applies to COFINA Agent; (II) Confirming Retention of Local Counsel; and (III) Clarifying Payment of Fees and Expenses of COFINA Agent and Her Professionals [17-3283, Dkt. No. 1452], and respectfully states as follows:

1. Dennis Dunne and Atara Miller of Milbank, Tweed, Hadley & McCloy LLP will appear on behalf of Ambac at the October 25, 2017 hearings regarding the following:

<sup>&</sup>lt;sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

- Motion of COFINA Agent Pursuant to 48 U.S.C. § 2161 and 11 U.S.C. § 105(a) for Order: (I) Confirming that 48 U.S.C. § 2125 Applies to COFINA Agent; (II) Confirming Retention of Local Counsel; and (III) Clarifying Payment of Fees and Expenses of COFINA Agent and Her Professionals (Dkt. No. 1121); and
- Urgent Joint Motion of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Puerto Rico Electric Power Authority, and the Puerto Rico Fiscal Agency and Financial Advisory Authority for Order Concerning Receipt and Use of Anticipated Federal Disaster Relief Funds and Preserving Rights of Parties (Dkt. No. 1444).
- 2. Mr. Dunne and Ms. Miller also appear to respond to any statements made by any party in connection with the above-captioned Title III Case or any adversary proceedings currently pending in the COFINA Title III Case.
- 3. Mr. Dunne and Ms. Miller will appear in person in Courtroom #17C of the United States District Court for the Southern District of New York.

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WHEREFORE, Ambac respectfully requests that the Court take notice of the

foregoing.

Dated: October 20, 2017

San Juan, Puerto Rico

#### FERRAIUOLI LLC

By: /s/ Roberto Cámara-Fuertes

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### **CERTIFICATE OF SERVICE**

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

/s/ Roberto Cámara-Fuertes

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